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States Government

Department of Energy

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Memorandum

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Rocky Flats Office

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OCT 24 1991

ROCKY FLATS
CORRESPONDENCE CONTROL

ERD SG 9043

Operable Unit No 2 Groundwater IM/IRA

J M. Kersh, Associate General Manager
Environmental Restoration and Waste Management
EG&G Rocky Flats Inc

As an alternative to a surface water Operable Unit 2 Interim Measure/Interim Remedial Action (IM/IRA) for the seeps in the Woman Creek basin we have agreed with EPA/CDH that we will revisit a groundwater action. As shown in the October 11 1991 letter (attached) from EPA/CDH, we are to present a detailed outline of the proposed groundwater IM/IRA and a detailed schedule (starting with resubmittal of a Draft IM/IRA) in the October 30 1991 meeting. In order to meet this deadline we need this information from you by October 29 1991.

There are three approaches to this IM/IRA that will be different than previous approaches. First, we are proposing to use the Observational (or Streamlined) approach to this IM/IRA. Second, the primary goal of this IM/IRA will be to provide information useful to the final remedy rather than abatement of an imminent threat or containing a migrating groundwater plume. Third, the IM/IRA will evaluate real time monitoring technologies for contaminants of concern.

The Observational Approach has been endorsed by DOE and EPA Headquarters as a streamlined approach to environmental restoration. This approach is laid out in the OSWER Directive No 9355 3-06 RI/FS Streamlining. The Observational Approach is a technique for managing uncertainty that can focus efforts on data collection on cleanup technology needs with contingencies identified so that the approach has a great deal of flexibility for dealing with conditions encountered. Presentations on the Observational Approach sponsored by DOE HQ were given to DOE and EG&G staff on August 20-21 1991. However for the benefit of those EG&G/subcontractor staff involved with this project, the HQ Observational Approach Team is returning October 23 24 to assist us in developing an Observational Approach IM/IRA. A key element of the approach for this IM/IRA will be availability of current RFI/RI data as it is acquired. Therefore the OU2 RFI/RI project manager is needed as a member of the team in the development and implementation of this IM/IRA.

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ADMIN RECORD

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In order for this IM/IRA to provide information useful to the final remedy we will be using the guidance in the OSWER Directive 9355 4-3 "Considerations in Ground Water Remediation at Superfund Sites" so that collection of remediation data/information can be obtained to allow for evaluation/demonstration of technologies for the design of an efficient cleanup approach that more accurately estimates the time frames required for remediation and the practicability of achieving cleanup goals. As a side benefit, removal and treatment of groundwater contamination will result. This might consist of operating extraction systems on a small scale that can be supplemented incrementally as information on response is obtained. In addition the evaluation of real time (results in the same day as sample taken) monitoring and analysis technology will need to be a part of the IM/IRA. We need to start demonstration of analysis technologies so that we can begin to get regulatory acceptance of using these sensors/instruments as indicators of contaminant levels. Since remediation and sensor/instrument technology is to be a part of this IM/IRA it is important that the Environmental Managements Environmental Research and Technology Department (with support from Technology Development) be involved in the development and implementation of this IM/IRA.

One significant benefit of using the Observational Approach and starting small will be to begin field evaluations quickly (within three to four months) following regulatory approval of the IM/IRA Decision Document.

Please direct any questions to Scott Grace of my staff at extension 7199


David P. Simonson
Assistant Manager
for Environmental Management

Attachment

cc w/Attachment.

A Rampertaap EM-453

E Evered, EG&G/RF

M. Arndt, EG&G/RF

P Bunge EG&G/RF

T Greengard EG&G/RF

D Pontius EG&G/RF

S Nesta EG&G/RF